

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

WIKIMEDIA FOUNDATION,

Plaintiff,

v.

NATIONAL SECURITY AGENCY /
CENTRAL SECURITY SERVICE, *et al.*,

Defendants.

Hon. T. S. Ellis, III

Civil Action No.
15-cv-00662-TSE

**OUT-OF-TIME MOTION FOR AN EXTENSION OF
TIME TO FILE PLAINTIFF'S OPPOSITION
TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Plaintiff Wikimedia Foundation hereby moves out-of-time for an extension from Friday, December 14, 2018, to Tuesday, December 18, 2018, *nunc pro tunc*, to file its opposition to Defendants' motion for summary judgment. *See* ECF No. 162. If granted, Plaintiff's requested extension would not affect any remaining deadlines for further briefing and oral argument. *See* ECF No. 158. For the reasons stated below, Plaintiff respectfully requests that the Court grant its out-of-time-motion.

1. The Court's Order of September 25, 2018, required Defendants to file their motion for summary judgment by November 9, 2018. *See* ECF No. 158.
2. On November 5, 2018, Defendants sought Plaintiff's consent to an extension of this deadline to November 13, 2018. Plaintiff consented to Defendants' request, provided that Defendants would also seek an equivalent extension of Plaintiff's deadline to file its opposition from December 14, 2018, to December 18, 2018. Defendants did so in a motion filed with the Court on November 6, 2018. *See* ECF No. 159.

3. On November 13, 2018, while Defendants' motion for an extension of time was pending, Defendants filed their motion for summary judgment, as well as an out-of-time motion for an extension of time. *See* ECF Nos. 160, 162.

4. Because the government's extension motions remain pending, including its request that Plaintiff's opposition deadline be extended by four days, Plaintiff respectfully requests that the Court extend the deadline for the submission of its opposition to Defendants' motion for summary judgment to today, December 18, 2018, *nunc pro tunc*.

5. This extension will not prejudice any party to this action or unduly delay these proceedings, as other deadlines currently on the calendar for further briefing and oral argument remain unchanged.

For the foregoing reasons, Plaintiff respectfully requests that the Court extend the deadline for its opposition to Defendants' summary judgment motion, *nunc pro tunc*, from Friday, December 14, 2018, to Tuesday, December 18, 2018.

Dated: December 18, 2018

Respectfully submitted,

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